REMARKS

In the final Office Action, the Examiner rejected claims 1-6, 11-18, 20, 22-25, and 27-36 under 35 U.S.C. § 102(b) as anticipated by Pant et al. (U.S. Patent No. 6,012,053), rejected claims 7, 9, and 10 under 35 U.S.C. § 103(a) as unpatentable over Pant et al. in view of Page (U.S. Patent No. 6,285,999), rejected claim 8 under 35 U.S.C. § 103(a) as unpatentable over Pant et al. in view of Lazarus et al. (U.S. Patent No. 6,134,532), and rejected claims 19, 21, and 26 under 35 U.S.C. § 103(a) as unpatentable over Pant et al. in view of Brown et al. (U.S. Patent No. 6,665,838).

By this Amendment, Applicants propose canceling claims 35 and 36 without prejudice or disclaimer and amending claims 1-4, 7-9, 11-14, 24-27, and 31 to improve form. Applicants respectfully traverse the Examiner's rejections under 35 U.S.C. §§ 102 and 103 with regard to the pending claims 1-34.

In paragraph 1-1 of the Office Action, the Examiner rejected pending claims 1-6, 11-18, 20, 22-25, and 27-34 under 35 U.S.C. § 102(b) as allegedly anticipated by Pant et al. Applicants respectfully traverse the rejection.

A proper rejection under 35 U.S.C. § 102 requires that a single reference teach every aspect of the claimed invention either expressly or impliedly. Any feature not directly taught must be inherently present. In other words, the identical invention must be shown in as complete detail as contained in the claim. See M.P.E.P. § 2131. Pant et al. does not disclose or suggest the combination of features recited in claims 1-6, 11-18, 20, 22-25, and 27-34.

Amended independent claim 1, for example, is directed to a computer-implemented method for modifying documents to aid a user in determining which entry of one or more entries

in the documents to choose. The method comprises identifying a preexisting document stored by a server in a network, where the identified document includes one or more entries; determining a score for each of the entries in the identified document; modifying the identified document based on the determined scores; and providing the modified document.

Pant et al. does not disclose or suggest the combination of features recited in claim 1. For example, Pant et al. does not disclose or suggest identifying a preexisting document stored by a server in a network, where the identified document includes one or more entries, and determining a score for each of the entries in the identified document, as recited in claim 1.

The Examiner alleged that Pant et al. discloses identifying a document that includes one or more entries and determining scores for each of the entries in the identified document and cited column 2, lines 35-55, column 13, lines 9-25, and Figures 7-9 of Pant et al. for support (final Office Action, page 2). Applicants respectfully disagree.

At column 2, lines 35-55, Pant et al. discloses:

> This module has an output for providing an indication of a score indicative of relevance for each of the items in the set of search results. A sorting module has an input which receives the score associated with each item and an indication of the set of search results, and an output providing to the user an indication of the items in the set of search results in an order ranked according to the relevance score of each item.

> Other aspects of the invention include the process performed by the computer system to apply the relevance factors to the search results to provide a score for each item in the search results. Another aspect of the invention is a client computer and the process performed by the client computer to communicate with a database server to provide relevance factors and receive the ranked searched results. Another aspect of the invention is a server computer and the process performed by the server computer to receive and process a query and relevance factors from a client computer to produce relevancy ranked search results.

In this section, Pant et al. discloses that a user can provide relevance factors that are used to score items (documents) in a set of search results obtained based on a query and rank the items

(documents) based on their scores. Nowhere in this section, or elsewhere, does <u>Pant et al.</u>

disclose or suggest identifying a preexisting document stored by a server in a network, where the

identified document includes one or more entries, as required by claim 1.

At column 13, lines 9-25, <u>Pant et al.</u> describes Figures 7-9 as follows:

> An example result is shown in FIG. 7. In this embodiment, the scores are shown for each
> item, but in other embodiments, such scores may be omitted. This search is the result of
> the query shown at 320 in FIG. 6. Each item includes a hypertext link 330 to the source of
> the document, a descriptor 332 of the document (usually text taken from the beginning of
> the document), an indication 334 of the source of the document and an indication of its
> score, as a function of the maximum score of the retrieved items. FIG. 8 illustrates results
> achieved with the same query when the relevance factor is the order of the search terms,
> set at a value of 100. FIG. 9 illustrates the results achieved with the same query when the
> selected relevance factors are words match, proximity and field, with values set at 100,
> 100 ad 10, respectively. As can be seen from the results, the search query and number of
> hits remains unchanged, but the presentation of results differs.

In this section, <u>Pant et al.</u> describes examples of search results that may be presented to a user.

Nowhere in this section, or elsewhere, does <u>Pant et al.</u> disclose or suggest identifying a

preexisting document stored by a server in a network, where the identified document includes

one or more entries, and determining a score for each of the entries in the identified document, as

required by claim 1.

At page 12 of the final Office Action, the Examiner alleged that the documents in <u>Pant et
al.</u> are equivalent to the entries recited in claim 1. Applicants assume that the Examiner means

that the search result document (col. 6, lines 12-15) that includes search result items (documents)

(e.g., Figs. 7-9) described by <u>Pant et al.</u> is allegedly equivalent to the "identified document" that

includes "one or more entries," as recited in claim 1. Applicants disagree. The items in the

search results in <u>Pant et al.</u> are not included in a document until the items are identified, scored,

and ranked (col. 5, line 61 - col. 6, line 15). In particular, <u>Pant et al.</u> discloses that the "ranked

results 178 provided by the sorting module <u>are formed into an HTML document</u> which is

returned to the browser 150 via the HTTP server 160 as indicated at 180" (col. 6, lines 12-15)

(emphasis added). Therefore, it would be unreasonable to allege that <u>Pant et al.</u> discloses or

suggests identifying the search result document that includes search result items, determining a

score for each of the search result items in the identified search result document, modifying the

identified search result document based on the determined scores, and providing the modified

search result document, as required by claim 1.

For at least these reasons, Applicants submit that claim 1 is not anticipated by <u>Pant et al.</u>

Claims 2-6, 11-18, 20, 22, and 23 depend from claim 1 and are, therefore, not anticipated by <u>Pant</u>

<u>et al.</u> for at least the reasons given with regard to claim 1. Claims 2-6, 11-18, 20, 22, and 23 are

also not anticipated by <u>Pant et al.</u> for reasons of their own.

For example, claim 4 recites intercepting data of a document sent from a server to a

client. <u>Pant et al.</u> does not disclose or suggest this feature.

The Examiner alleged that with a broad reasonable interpretation of "intercept" to mean

"seize on the way," <u>Pant et al.</u> discloses that the server seizes information it receives from the

Internet and presents only entry information to the client browser (final Office Action, pages 12-

13). Applicants disagree.

Even assuming that the Examiner's definition of "intercept" is correct (a point that

Applicants do not concede), Applicants submit that HTTP server 160 in <u>Pant et al.</u> does not

"seize" ranked results "on the way." Instead, <u>Pant et al.</u> specifically discloses that the ranked

results are provided to HTTP server 160, which then forwards the ranked results to client

browser 150 (Fig. 3; col. 6, lines 12-15). Therefore, HTTP server 160 does not "intercept" or

"seize" the ranked results "on their way" to client browser 150, as alleged by the Examiner.

For at least these additional reasons and the reasons provided in the last Amendment, Applicants submit that claim 4 is not anticipated by Pant et al.

Amended independent claim 24 is directed to a system for modifying a document to aid a user in determining which entry of a plurality of entries in the document to select. The system comprises means for identifying a document based on an address associated with the identified document, where the identified document includes a plurality of entries; means for determining a score for each of the entries in the identified document; means for modifying the identified document based on the determined scores; and means for providing the identified document to the user.

Pant et al. does not disclose the combination of features recited in claim 24. For example, Pant et al. does not disclose or suggest means for identifying a document based on an address associated with the identified document, where the identified document includes a plurality of entries.

The Examiner alleged that Pant et al. discloses identifying a document that includes one or more entries and cited column 2, lines 35-55, column 13, lines 9-25, and Figures 7-9 of Pant et al. for support (final Office Action, page 2). Applicants respectfully disagree.

Column 2, lines 35-55, of Pant et al. has been reproduced above. In this section, Pant et al. discloses that a user can provide relevance factors that are used to score items (documents) in a set of search results obtained based on a query and rank the items (documents) based on their scores. Nowhere in this section, or elsewhere, does Pant et al. disclose or suggest means for identifying a document based on an address associated with the identified document, where the

- 16 -

identified document includes a plurality of entries, as required by claim 24.

Column 13, lines 9-25, of Pant et al. describes Figures 7-9 and has been reproduced above. In this section, Pant et al. describes examples of search results that may be presented to a user. Nowhere in this section, or elsewhere, does Pant et al. disclose or suggest means for identifying a document based on an address associated with the identified document, where the identified document includes a plurality of entries, as required by claim 24.

At pages 12 and 13 of the final Office Action, the Examiner alleged that the documents in Pant et al. are equivalent to the entries recited in claim 24. Applicants assume that the Examiner means that the search result document (col. 6, lines 12-15) that includes search result items (documents) (e.g., Figs. 7-9) described by Pant et al. are allegedly equivalent to the "identified document" that includes "a plurality of entries," as recited in claim 24. In light of this interpretation, nowhere does Pant et al. disclose or suggest that the search result document is identified based on an address associated with the search result document, as would be required by claim 24.

For at least these reasons, Applicants submit that claim 24 is not anticipated by Pant et al.

Amended independent claim 25 recites feature similar to features described above with regard to claims 1 and 24. Claim 25 is, therefore, not anticipated by Pant et al. for reasons similar to reasons given with regard to claims 1 and 24.

Amended independent claim 27 is directed to a web browser stored in a computer-readable medium. The web browser includes instructions for requesting documents stored on at least one server based on addresses associated with the documents, where each of the documents includes one or more entries; instructions for determining scores for each of the entries;

instructions for modifying the requested documents based on the determined scores; and

instructions for presenting the modified documents to facilitate selection of one or more of the

entries.

Pant et al. does not disclose or suggest the combination of features recited in claim 27.

For example, Pant et al. does not disclose or suggest instructions for requesting documents stored

on at least one server based on addresses associated with the documents, where each of the

documents includes one or more entries.

The Examiner alleged that Pant et al. discloses instructions for requesting documents on

at least one server, where each of the documents includes one or more entries and cited column 4,

lines 1-26, and column 2, lines 35-55, of Pant et al. for support (final Office Action, page 5).

Applicants respectfully disagree.

At column 4, lines 1-26, Pant et al. discloses:

> The computer system 100 may be one or more general purpose computer systems which
> are programmable using a high level computer programming language, such as "C, or
> "Pascal." The computer system also may be implemented using specially programmed,
> special purpose hardware. In a general purpose computer system, the processor is typically
> a commercially available processor, of which the series x86 processors, available from
> Intel, and the 680X0 series microprocessors available from Motorola are examples. Many
> other processors are available. Such a microprocessor executes a program called an
> operating system, of which UNIX, DOS and VMS are examples, which controls the
> execution of other computer programs and provides scheduling, debugging, input/output
> control, accounting, compilation, storage assignment, data management and memory
> management, and communication control and related services. The processor and
> operating system define a computer platform for which application programs in high-level
> programming languages are written. It should be understood the invention is not limited to
> a particular computer platform, particular processor, or particular high-level programming
> language. Additionally, the computer system may be a multiprocessor computer system or
> may include multiple computers connected over a computer network. As such, the
> database may be local to the user or remote.

Nowhere in this section, or elsewhere, does Pant et al. disclose or suggest instructions for

requesting documents stored on at least one server based on addresses associated with the documents, where each of the documents includes one or more entries, as required by claim 27.

Column 2, lines 35-55, of Pant et al. has been reproduced above. In this section, Pant et al. discloses that a user can provide relevance factors that are used to score items (documents) in a set of search results obtained based on a query and rank the items (documents) based on their scores. Nowhere in this section, or elsewhere, does Pant et al. disclose or suggest instructions for requesting documents stored on at least one server based on addresses associated with the documents, where each of the documents includes one or more entries, as required by claim 27.

Pant et al. also does not disclose or suggest instructions for determining scores for each of the one or more entries in documents stored on at least one server, as recited in claim 27.

The Examiner alleged that Pant et al. discloses this feature and cited column 4, lines 1-26, column 2, lines 35-55, and column 13, lines 9-25 of Pant et al. for support (final Office Action, page 5). Applicants disagree.

Column 4, lines 1-26, of Pant et al. has been reproduced above. Nothing in this section even remotely suggests instructions for determining scores for each of one or more entries in documents stored on at least one server, as required by claim 27. Instead, Pant et al. simply discloses that computer system 100 may be a general purpose computer system or a multiprocessor computer system.

Column 2, lines 35-55, and column 13, lines 9-25, of Pant et al. have been reproduced above. Nowhere in these sections, or elsewhere, does Pant et al. disclose or suggest instructions for determining scores for each of one or more entries in documents stored on at least one server, as required by claim 27.

In the final Office Action, the Examiner alleged again that <u>Pant et al.</u> discloses instructions for determining scores for each of the one or more entries in documents stored on at least one server by disclosing "on a server, relevance factors are presented for search query" and cited column 5, lines 5-15 of <u>Pant et al.</u> for support (final Office Action, page 13). Applicants submit that the Examiner is not addressing the feature of claim 27. The feature in question relates to determining scores for entries in documents, whereas the cited section of <u>Pant et al.</u> discloses that a search query and relevance factors are provided to a database query engine. Therefore, the Examiner's allegations fall short of establishing a proper case of anticipation.

Further, it is unclear with regard to claim 27 whether the Examiner equates the items identified in the search results or the search results themselves as allegedly equivalent to the claimed documents that include one or more entries. In the final Office Action, the Examiner still did not clarify this deficiency in the Examiner's rejection. If the Examiner persists with this rejection, Applicants respectfully request that the Examiner clearly identify whether (1) the items identified in the search results or (2) the search results themselves are alleged to be equivalent to the claimed documents that include one or more entries. Applicants submit that in either case <u>Pant et al.</u> does not disclose or suggest the claimed combination of features recited in claim 27.

Assuming that the items identified in the search results could be equated to documents that include one or more entries, <u>Pant et al.</u> does not disclose or suggest instructions for determining scores for each of the entries in the items of the search results, instructions for modifying the items of the search results based on the determined scores, or instructions for presenting the modified items to facilitate selection of one or more of the entries, as required by claim 27. Instead, <u>Pant et al.</u> discloses identifying <u>search result items</u>, scoring the <u>search result</u>

items, and ranking the search result items based on the scores (col. 5, line 60 - col. 6, line 15).

Assuming that the search results themselves could be equated to a document that includes one or more entries, Pant et al. does not disclose or suggest instructions for requesting documents stored on at least one server based on addresses associated with the documents, where each of the documents include one or more entries, as required by claim 27. The search query sent by the browser in Pant et al. does not request search results stored on at least one server based on addresses associated with the search results. Instead, the search results are generated in response to the search query.

In response to this latter argument, the Examiner alleged that Pant et al. discloses that the "user performing a search query, which performs a database query to find the search item where the search items are in the database, the results can be presented by electronic mail document" (final Office Action, page 13). Applicants submit that the Examiner is not addressing Applicants' argument with regard to claim 27. The feature in question relates to requesting documents stored on at least one server based on addresses associated with the documents, where each of the documents includes one or more entries, whereas the Examiner alleged that Pant et al. discloses performing a search and returning results. Therefore, the Examiner's allegations fall short of establishing a proper case of anticipation.

In addition to the foregoing deficiencies in the disclosure of Pant et al., Pant et al. does not disclose or suggest a web browser that includes instructions for requesting documents stored on at least one server based on addresses associated with the documents, each of the documents including one or more entries, instructions for determining scores for each of the entries, instructions for modifying the requested documents based on the determined scores, and

instructions for presenting the modified documents to facilitate selection of one or more of the entries. None of the sections of Pant et al. identified by the Examiner refer to processing by a web browser.

In the final Office Action, the Examiner alleged that Pant et al. discloses a browser working with a server to service search query requests (final Office Action, page 13). From this statement, it appears that the Examiner agrees that Pant et al. does not disclose a web browser with the instructions recited in claim 27. Claim 27 does not disclose a web browser operating in conjunction with a server, but, instead, recites a web browser stored in a computer-readable medium and comprising a group of instructions that are neither disclosed or suggested by Pant et al. Therefore, the Examiner did not establish a proper case of anticipation with regard to claim 27.

For at least these reasons, Applicants submit that claim 27 is not anticipated by Pant et al.

Amended independent claim 28 recites a combination of features of a computer-implemented method for modifying entries in an existing document to aid a user in determining which of the entries to select. The method includes receiving a request for an existing document that includes one or more entries, determining a score for each of the entries in the document, modifying the entries by at least one of reordering, deleting, visually distinguishing, or annotating the entries based on the determined scores, and providing the document with the modified entries to the user.

Pant et al. does not disclose or suggest the combination of features recited in claim 28. For example, Pant et al. does not disclose or suggest receiving a request for an existing document that includes one or more entries and determining a score for each of the entries in the document,

as recited in claim 28.

The Examiner alleged that <u>Pant et al.</u> discloses these features and cited column 3, lines

30-55, column 1, line 33, and column 2, lines 35-55, of <u>Pant et al.</u> for support (final Office

Action, page 5). Applicants disagree.

At column 3, lines 30-55, <u>Pant et al.</u> discloses:

> A user supplies the search query 106 to the query engine 104 through a user interface 108. The database query engine 104 applies the search query 106 to the database 102 to provide search results 110 which include an indication of the items in the database 102 which match the search query 106. The search results typically include enough information to access the actual item, but generally does not include the entire item in order to reduce the amount of memory needed to process the search results. In the invention, a relevance determination module 112 receives the search results 110 from the database query engine 104 and applies pre-specified relevance factors 114 to each of the corresponding items in the search results 110 to obtain scored search results 116. In particular, each of the items in the search results 110 has a set of attributes associated with it, which the module 112 may use the database 102 to access and identify if such information is not made available in the search results 110. Each of these attributes is given a weight according to the specified relevance factors 114. These weights are combined to provide a score for each item. The scored search results are sorted by sorting module 118 to provide ranked results 120 which are provided to a user interface 122 to be output to the user.

From this section, it is unclear whether the Examiner equates an item identified in the search

results or the search results themselves as allegedly equivalent to the claimed existing document

that includes one or more entries. In the final Office Action, the Examiner clarified that the items

(text documents) are allegedly equivalent to the claimed existing document (final Office Action,

page 13).

Applicants submit that an item (text document) identified in the search results cannot

reasonably be equated to the existing document that includes one or more entries, as required by

claim 28. <u>Pant et al.</u> does not disclose or suggest determining a score for each of the entries in an

item (text document) of the search results, modifying the entries by at least one of reordering,

deleting, visually distinguishing, or annotating the entries based on the determined scores, or providing the item (text document) of the search results with the modified entries to the user, as required by claim 28. Instead, Pant et al. discloses identifying search result items (text documents), scoring the search result items (text documents), and ranking the search result items (text documents) based on the scores (col. 3, lines 32-55).

At column 1, line 33, Pant et al. discloses "items (e.g., records, text documents, etc.) . . . " Nothing in this section, or any other section, of Pant et al. cures the deficiencies noted above with regard to claim 28.

Column 2, lines 35-55, of Pant et al. has been reproduced above. Nothing in this section, or any other section, of Pant et al. cures the deficiencies noted above with regard to claim 28.

In the final Office Action, the Examiner also alleged that Pant et al. discloses determining a score for each of the entries by disclosing a "sorting module that scores associated with each item provided to the user in an order ranked according to score" (final Office Action, page 14). Applicants note that the Examiner previously identified an item (text document) as allegedly being equivalent to an existing document and then alleged that the item is allegedly equivalent to an entry in the existing document. Applicants submit that the Examiner's rejections are replete with these inconsistencies. *If the Examiner persists with the rejection of claim 28, or any of the other claims, based on Pant et al., Applicants respectfully request that the Examiner specifically identify whether the Examiner alleges that an "item" (text document) corresponds to an existing document or an entry in the existing document and clearly explain how the identified interpretation renders the claims obvious or anticipated.*

For at least these reasons, Applicants submit that claim 28 is not anticipated by Pant et al.

Claims 29 and 30 depend from claim 28 and are, therefore, not anticipated by Pant et al. for at least the reasons given with regard to claim 28.

Amended independent claim 31 recites features similar to features described above with regard to claim 28. Claim 31 is, therefore, not anticipated by Pant et al. for reasons similar to reasons given with regard to claim 28.

Independent claim 32 is directed to a first server in a network including the first server and a plurality of second servers. The first server comprises a memory configured to store instructions and a processor configured to execute the instructions in the memory to obtain, from one of the second servers, one or more entries from a document, determine scores for the one or more entries, and return the scores to the one second server.

Pant et al. does not disclose or suggest the combination of features recited in claim 32. For example, Pant et al. does not disclose or suggest a processor of a first server that is configured to obtain, from one of the second servers, one or more entries from a document, determine scores for the one or more entries, and return the scores to the one second server.

The Examiner alleged that Pant et al. discloses these features and cited column 2, lines 35-55, column 13, lines 9-25, and Figures 7-9 of Pant et al. for support (final Office Action, page 6). Applicants disagree.

Column 2, lines 35-55 and column 13, lines 9-25, of Pant et al. have been reproduced above. Nowhere in these sections, or elsewhere, does Pant et al. disclose or suggest a processor of a first server that obtains, from one of the second servers, one or more entries from a document, determines scores for the one or more entries, and returns the scores to the one second server. The search results of Pant et al. do not take the form of a document until they are ready to

be sent to the browser (col. 6, lines 12-15).

In the final Office Action, the Examiner alleged that "[w]ith a broad reasonable interpretation of the claim language, Pant teaches a network like Internet, which must have a web server on one side that serves web pages to the internet and a server that receives information from the internet, which must have a web server as well" (final Office Action, page 14). Applicants respectfully submit that the Examiner is misinterpreting the language of claim 32. Claim 32 clearly recites that a first server obtains <u>one or more entries from a document</u> from a second server, determines scores for the one or more entries, and returns the scores to the second server. Nowhere does <u>Pant et al.</u> disclose or suggest a first server that <u>obtains one or more entries from a document</u> from a second server, as required by claim 32.

For at least these reasons and reasons similar to reasons given above with regard to the other independent claims, Applicants submit that claim 32 is not anticipated by <u>Pant et al.</u> Independent claims 33 and 34 recite features similar to features described with regard to claim 32. Claims 33 and 34 are, therefore, not anticipated by <u>Pant et al.</u> for reasons similar to reasons given with regard to claim 32.

In paragraph 2-1 of the final Office Action, the Examiner rejected claims 7, 9, and 10 under 35 U.S.C. § 103(a) as allegedly unpatentable over <u>Pant et al.</u> in view of <u>Page</u>. Applicants respectfully traverse the rejection.

Claims 7, 9, and 10 depend from claim 1. While not acquiescing in the rejection set forth by the Examiner, Applicants submit that the disclosure of <u>Page</u> does not cure the deficiencies in the disclosure of <u>Pant et al.</u> as described above with regard to claim 1. Claims 7, 9, and 10 are, therefore, patentable over <u>Pant et al.</u> and <u>Page</u>, whether taken alone or in any reasonable

combination, for at least the reasons given with regard to claim 1.

In paragraph 2-2 of the final Office Action, the Examiner rejected claim 8 under 35 U.S.C. § 103(a) as allegedly unpatentable over Pant et al. in view of Lazarus et al. Applicants respectfully traverse the rejection.

Claim 8 depends from claim 1. While not acquiescing in the rejection set forth by the Examiner, Applicants submit that the disclosure of Lazarus et al. does not cure the deficiencies in the disclosure of Pant et al. as described above with regard to claim 1. Claim 8 is, therefore, patentable over Pant et al. and Lazarus et al., whether taken alone or in any reasonable combination, for at least the reasons given with regard to claim 1.

In paragraph 2-3 of the final Office Action, the Examiner rejected claims 19, 21, and 26 under 35 U.S.C. § 103(a) as allegedly unpatentable over Pant et al. in view of Brown et al. Applicants respectfully traverse the rejection.

Claims 19 and 21 depend from claim 1. While not acquiescing in the rejection set forth by the Examiner, Applicants submit that the disclosure of Brown et al. does not cure the deficiencies in the disclosure of Pant et al. as described above with regard to claim 1. Claims 19 and 21 are, therefore, patentable over Pant et al. and Brown et al., whether taken alone or in any reasonable combination, for at least the reasons given with regard to claim 1.

Amended independent claim 26 recites features similar to features described above with regard to claim 27. While not acquiescing in the rejection set forth by the Examiner, Applicants submit that the disclosure of Brown et al. does not cure the deficiencies in the disclosure of Pant et al. as described above with regard to claim 27. Claim 26 is, therefore, patentable over Pant et al. and Brown et al., whether taken alone or in any reasonable combination, for reasons similar to

reasons given with regard to claim 27.

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of the application and the timely allowance of pending claims 1-34.

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1-34 in condition for allowance. Applicants submit that the entry of this Amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

If the Examiner believes that the application is not now in condition for allowance, Applicants respectfully request that the Examiner contact the undersigned to discuss any outstanding issues.

To the extent necessary, a petition for an extension of time under 35 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

HARRITY & SNYDER, L.L.P.

By: _____
Paul A. Harrity
Reg. No. 39,574

Date: March 29, 2005
11240 WAPLES MILL ROAD
SUITE 300
FAIRFAX, VIRGINIA 22030
TELEPHONE: 571-432-0800
FACSIMILE: 571-432-0808